

EXHIBIT A

1 Hans W. Herb, Esq. SBN 136018  
2 LAW OFFICES OF HANS W. HERB  
3 P. O. Box 970  
4 Santa Rosa, CA 95402  
5 707/576-0757  
6 707/575-0364 Fax

7 Attorney for Defendant,  
8 Richard Mayfield

9 UNITED STATES DISTRICT COURT  
10 NORTHERN DISTRICT OF CALIFORNIA

11 PINOLEVILLE POMO NATION, *et al.*,

12 Plaintiffs,

13 v.

14 UKIAH AUTO DISMANTLERS, *et al.*,

15 Defendants.

Case No.: C-07-2648 SI

**NOTICE OF TAKING DEPOSITION OF  
PERSON MOST KNOWLEDGABLE AND  
DEMAND FOR DOCUMENTS**

16 TO ALL PARTIES AND THEIR ATTORNEYS OF RECORD:

17 PLEASE TAKE NOTICE that at 10:00 a.m. on April 7, 2008, at 110 S. Main  
18 Street, Suite C, Willits, CA 95490, pursuant to F.R.C.P. 30, Defendant and Cross-  
19 complainant, RICK MAYFIELD, will take the deposition of the person most  
20 knowledgeable or qualified at PINOLEVILLE POMO NATION ENVIRONMENTAL  
21 ASSOCIATION ("ASSOCIATION"), who is a party to this action and whose address and  
22 telephone number are known to its attorney, upon oral examination before a Notary  
23 Public authorized to administer oaths in the State of California. Said deposition will  
24 continue from day to day, excluding weekends and holidays, until completed.

25 NOTICE IS FURTHER GIVEN that the matters on which examination is  
26 requested are as follows:  
27  
28

1 The allegations contained in Plaintiffs' Complaint in this matter, particularly as to  
2 paragraphs 7, 9, 15 and all allegations of harm or damage to alleged ASSOCIATION  
3 members.

4 NOTICE IS FURTHER GIVEN that deponent, who is a party to this action, is  
5 required to produce the following documents, records or other materials at said  
6 deposition:

7 1. Any and all documents that support the allegations in paragraphs 7, 9 and  
8 15 of the Plaintiffs' Complaint.

9 2. Any documents concerning any alleged harm or damage to  
10 ASSOCIATION members.

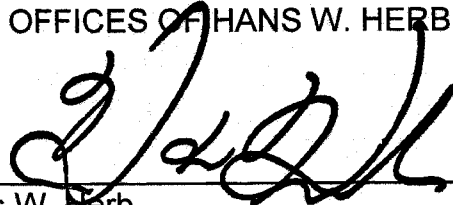
11 3. A complete and accurate list of all past and present members of the  
12 ASSOCIATION.

13 4. A copy of any documents generated by the ASSOCIATION relative to this  
14 matter, including but not limited to any e-mails, faxes or other communications.

15 5. A copy of all communications between the ASSOCIATION and any other  
16 plaintiff in this action, including but not limited to representatives of other plaintiffs.

17 Dated: March 24, 2008

LAW OFFICES OF HANS W. HERB



Hans W. Herb  
Attorney for Defendant  
and Cross-Complainant, Rick Mayfield

PROOF OF SERVICE

I, the undersigned, declare that:

I am a citizen of the United States, a resident of the County of Sonoma and am over the age of 18 years and not a party to this action. I am employed by the Law Offices of Hans W. Herb and my business address is 740 Fourth Street, Suite 102, Santa Rosa, CA 95404 (Mailing Address: P. O. Box 970, Santa Rosa, CA 95402).

On the date indicated below, I served the attached documents:

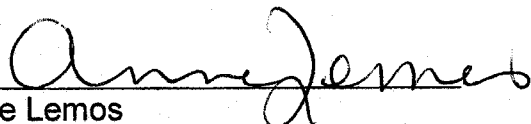
**NOTICE OF TAKING DEPOSITION OF PERSON MOST KNOWLEDGABLE  
AND DEMAND FOR DOCUMENTS**

On interested parties in said action by preparing a true copy thereof, and:

(MAIL) placing it in a sealed envelope in the United States mail at Santa Rosa, California, with first class postage fully prepaid. [Code of Civil Procedure Sections 1013a(1), 2015.5.]

Said envelope(s) are addressed as listed on the attached Service List.

I declare under penalty of perjury, under the laws of the State of California, that the foregoing is true and correct and that this declaration was executed on March 27, 2008, at Windsor, California.

  
Anne Lemos

**SERVICE LIST**

Case No. C-07-2648 SI  
Pinoleville Pomo Nation v. Ukiah Auto Dismantlers

Christopher James Neary  
Attorney at Law  
110 South Main Street, Suite C  
Willits, CA 95490

Fax:  
(707) 459-3018

Email:  
[cjneary@pacific.net](mailto:cjneary@pacific.net)

Represents Defendants:  
Kenneth Hunt  
Wayne Hunt  
U.S. Alchemy Corporation  
Ukiah Auto Dismantlers

Michael Shane Biggs  
Biggs Law PC  
PO Box 454  
Petaluma, CA 94953-0454

Fax:  
(707) 763-8010

Email:  
[michaelbiggs@biggslaw.net](mailto:michaelbiggs@biggslaw.net)

Represents Plaintiffs:  
Pinoleville Pomo Nation  
Pinoleville Pomo Nation Environmental  
Association  
Leona Williams